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Attorneys for Plaintiff
LAURA SANTOYO

**UNITED STATES EASTERN DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

LAURA SANTOYO,

Plaintiff,

v.

RICH PRODUCTS CORPORATION, a
California Corporation, and DOES 1 – 10,
inclusive,

Defendants.

Case No. 2:24-cv-1856-JDP

**JOINT STIPULATION EXTENDING
DEADLINE TO COMPLETE DISCOVERY;
AND ~~PROPOSED~~ ORDER**

Complaint Filed: May 24, 2024

1 RICH PRODUCTS CORPORATION (“Defendant”) and LAURA SANTOYO (“Plaintiff”)
2 (collectively, “the Parties”), by and through their undersigned counsel, hereby stipulate and agree as
3 follows:

4 WHEREAS, the current deadline to complete discovery (for the limited purpose of
5 completing the deposition of Plaintiff’s expert, Charles E. Craig, as below), pursuant to the Court’s
6 Order of December 2, 2025 (DKT 36) is December 19, 2025;

7 WHEREAS, the Parties have been diligent in the discovery process, including through
8 propounding and responding to multiple sets of written discovery and through taking multiple
9 depositions (4) fact witnesses and two expert witnesses to date by Defendant; 12 fact witnesses and
10 one expert witness by Plaintiff by Plaintiff);

11 WHEREAS, Defendant deposed Plaintiff’s designated expert on occupational safety and
12 health issues, Charles Craig, on November 18, 2025;

13 WHEREAS, said deposition, due to scheduling issues, was concluded after approximately 3
14 hours on the record;

15 WHEREAS, Defendant seeks, and Plaintiff does not oppose, a second day of deposition for
16 Mr. Craig;

17 WHEREAS, Mr. Craig’s next availability for deposition is after December 19, 2025, the
18 present discovery cutoff, the Parties stipulate as follows:

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IT IS HEREBY STIPULATED and agreed by the Parties hereto, through their respective counsel, that the discovery cutoff in this matter shall be extended by 28 days, up to and through **January 16, 2026**, but only to permit the completion of the deposition of Mr. Craig.

IT IS SO STIPULATED.

Dated: December 16, 2025

GAVRILOV & BROOKS

By: _____
Alexandra Darling, Esq.
Jamie Keeton, Esq.

Attorneys for Plaintiff
LAURA SANTOYO

Dated: December 16, 2025

HIRSCHFELD KRAEMER LLP

By: _____
Monte Grix, Esq.
Michelle C. Freeman, Esq.

Attorneys for Defendant
RICH PRODUCTS CORPORATION

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ATTESTATION

In accordance with Local Rule 131(e), the attorney whose signature appears below, and who is e-filing this document, affirms he/she has obtained authorization and approval from all other counsel above to file this document on that counsel's behalf.

Dated: December __, 2025

Alexandra Darling

GAVRILOV & BROOKS
2315 CAPITOL AVENUE
SACRAMENTO, CA 95816

[PROPOSED] ORDER

Based upon the foregoing stipulation of the Parties, and good cause appearing therefor,
IT IS HEREBY ORDERED AS FOLLOWS:

The deadline of **December 19, 2025** for the Parties to complete discovery is hereby vacated, with a new deadline of **January 16, 2026** for the express and sole purpose of permitting the completion of Defendant's deposition of Plaintiff's designated expert witness, Charles Craig.

Aside from this new deadline, the Court's Initial Pretrial Scheduling Order (DKT 20), as modified by the Court's Order of June 24, 2025 (DKT 34) remains unchanged.

IT IS SO ORDERED.

Dated: December 18, 2025


JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE

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